

May 20, 1996



VIA FEDERAL EXPRESS

Office of the Secretary
Federal Communications Commission
1919 M Street, Northwest
Washington, D.C. 20554

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DOCKET FILE COPY ORIGINAL

Re: Comments of VarTec Telecom, Inc. Regarding CC Docket No. 92-237

Dear Secretary:

Pursuant to and in compliance with Federal Communications Commission ("FCC") Rules, Sections 1.415 and 1.419, transmitted herewith on behalf of VarTec Telecom, Inc. please find an original and four copies of the Company's Comments regarding the above-mentioned matter. Also, please find the enclosed additional five copies of this filing which VarTec respectfully requests be distributed to each individual Commissioner.

VarTec appreciates your attention in this matter. Please direct any inquiries or correspondence regarding this filing to the undersigned or Michael G. Hoffman, Esq., General Counsel and Senior Vice President, Legal and Regulatory Affairs at the below described address and telephone number.

Respectfully submitted,

Becky Gipson
Regulatory Analyst

Enclosures

cc: Network Services Division (two copies)
Common Carrier Bureau
Federal Communications Commission
Room 235
2000 M Street, Northwest
Washington, D.C. 20554

ITS, Inc.
2100 M Street, Northwest, Suite 140
Washington, D.C. 20037

Michael G. Hoffman, Esq.
General Counsel and Senior Vice President
Legal and Regulatory Affairs

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List ABCDE

VarTec Telecom, Inc.
3200 W. Pleasant Run Road
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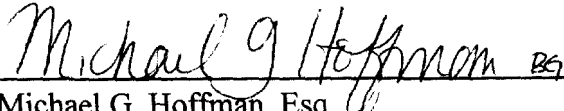
CERTIFICATE OF SERVICE

I hereby certify that I have this day served (via Federal Express) nine (9) complete copies of VarTec's Comments regarding CC Docket No. 92-327 upon the Office of the Secretary, Federal Communications Commission, 1919 M Street, Northwest, Washington, D.C. 20554 as well as copies of the this filing on the following entities listed below via First Class U.S. Mail:

Network Services Division (two copies)
Common Carrier Bureau
Federal Communications Commission
Room 235
2000 M Street, Northwest
Washington, D.C. 20554

ITS, Inc.
2100 M Street, Northwest, Suite 140
Washington, D.C. 20037

Dated at Lancaster, Texas this 20th day of May, 1996.


Michael G. Hoffman, Esq.
General Counsel and
Senior Vice President
Legal and Regulatory Affairs
VarTec Telecom, Inc.

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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IN THE MATTER OF)
)
Administration of the North American)
Number Plan;)
 Phase II)
Feature Group D Carrier)
Identification Code Expansion Plan)
_____)

CC Docket No. 92-237

COMMENTS

Michael G. Hoffman, Esq.
General Counsel and
Senior Vice President
Legal and Regulatory Affairs
VarTec Telecom, Inc.
3200 West Pleasant Run Road
Lancaster, Texas 75146
(214) 230-7200

Dated: May 20, 1996

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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IN THE MATTER OF)
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Administration of the North American)
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 Phase II)
Feature Group D Carrier)
Identification Code Expansion Plan)
_____)

CC Docket No. 92-237

COMMENTS

VarTec Telecom, Inc. ("VarTec") hereby files Comments with the Federal Communications Commission, pursuant to 47 Code of Federal Regulations, Sections 1.415 and 1.419, regarding the expansion of and Feature Group D ("FGD") Carrier Identification Codes ("CICs").

These Comments will demonstrate that the appropriate length of the transition period has not been affected by the assignment of four digit CICs, the increase and expected increase in the demand for CIC assignments and dialing parity provided by local exchange carriers. In fact, these events further substantiate the absolute necessity of an extended transition period of six years or longer due customer confusion.

As consumers continue to be exposed to both seven (7) and five (5) digit Carrier Access Codes ("CACs") and their uses, confusion between the two code lengths will increase. Any reduction in the length of the transition period may lead to unnecessary confusion among consumers


and ultimately result in the sole use of presubscribed 1+ services rather than consumers accessing interexchange carriers (“IXCs”) via their CACs. Smaller IXCs, such as VarTec, require a lengthy transition period in order to thoroughly educate consumers about the change in the number of digits in their CACs. This education process will require significant time and tremendous financial resources to contact the hundreds of thousands of consumers who access VarTec’s services by dialing its CACs before the intended destination telephone number.

VarTec will educate consumers about this change primarily via direct mail marketing literature. This process will require VarTec to purchase the names and addresses of consumers who access its services by dialing its CACs as VarTec does not retain such information about consumers who utilize its services without presubscribing their telephone accounts to VarTec.

VarTec has been building its customer base for approximately seven years with an emphasis on customers using its CACs. VarTec believes that a similar amount of time is required to contact these customers again to educate them on the change in the number of digits in its CACs. Further, VarTec believes that its customers dial its CACs before placing a long distance telephone call due habit and ritual. As such, the process to alter these customers’ dialing patterns will be lengthy.

In summary, VarTec submits that the significant events mentioned above do not impact the length of the transition period of six years. These events only support the need for an extended transition period, six years or more in length, to reduce and prevent unnecessary customer confusion about the change in the number of CAC digits through the use of educational marketing literature.

Respectfully submitted on behalf of VarTec Telecom, Inc.

A handwritten signature in cursive script, reading "Michael G. Hoffman Esq.", written over a horizontal line.

Michael G. Hoffman, Esq.
General Counsel and
Senior Vice President
Legal and Regulatory Affairs
3200 West Pleasant Run Road
Lancaster, Texas 75146
(214) 230-7200

Dated: May 20, 1996